

Law Offices
Duncan, Weinberg, Genzer & Pembroke, P.C.

WALLACE L. DUNCAN (1937-2008)
EDWARD WEINBERG (1918-1995)
ROBERT WEINBERG
JEFFREY C. GENZER
THOMAS L. RUDEBUSCH
MICHAEL R. POSTAR
ELI D. EILBOTT*
LISA S. GAST
PETER J. SCANLON
KATHLEEN L. MAZURE
DEREK A. DYSON
BHAVEETA K. MODY
KRISTEN CONNOLLY McCULLOUGH
JOSHUA E. ADRIAN
MATTHEW R. RUDOLPHI
JASON T. GRAY
NATALIE M. KARAS
GREGORY D. JONES

SUITE 800
1615 M STREET, N.W.
WASHINGTON, DC 20036

(202) 467-6370
FAX (202) 467-6379
www.dwgp.com

DONALD H. CLARKE*
SETH T. LUCIA*
JAMES D. PEMBROKE*
TANJA M. SHONKWILER*
TERRY E. SINGER*

California Office
SUITE 1410, 915 L STREET
SACRAMENTO, CA 95814
(916) 498-0121
SEAN M. NEAL

Northeast Regional Office
2700 BELLEVUE AVENUE
SYRACUSE, NY 13219
(315) 471-1318
THOMAS J. LYNCH*

January 15, 2014

*REGISTERED TO PRACTICE BEFORE U.S.
PATENT AND TRADEMARK OFFICE

*OF COUNSEL

Via Electronic Comment Filing System (ECFS)

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *WC Docket No. 09-197*
Ex Parte Response to Staff Information Requests
Petition of NTUA WIRELESS, LLC for Designation as an Eligible
Telecommunications Carrier Pursuant to Section 214(e)(6) of the
Communications Act of 1934, as Amended, on the Navajo Nation

Dear Ms. Dortch:

On behalf of NTUA Wireless, LLC (“NTUA Wireless”), please find the attached attachments submitted in response to inquiries made by FCC Staff from the Office of Native Affairs and Policy (“ONAP”) on a January 9, 2014. The attached submittal relates to NTUA Wireless’ ETC Application, which is pending unopposed at the Federal Communications Commission (“Commission” or “FCC”) in WC Docket No. 09-197. NTUA Wireless is majority-owned by the Navajo Tribal Utility Authority, an enterprise of the Navajo Nation. As discussed further below, the attached exhibits provided by NTUA Wireless are added to the record and included as an *ex parte* exhibit.

Attachment 1 herein includes a clarification (“Clarification”) of NTUA Wireless that, as a necessary part of its petition for ETC designation throughout the Navajo Nation, NTUA Wireless expressly seeks to include the Jeddito Chapter of the Navajo Nation as part of its ETC service area. NTUA Wireless also makes clear that it does not seek to include any part of the Hopi Reservation as part of the NTUA Wireless ETC service area. Consistent with the

foregoing, NTUA Wireless clarifies for the record in the attached Clarification that its proposed ETC service area includes the telephone company area of Hopi Telecommunications Inc. (“HTP”) that serves the Jeddito Chapter of the Navajo Nation. NTUA Wireless’ previously omitted to include HTI as one of the telephone company areas within NTUA Wireless’ proposed ETC service area. These points are reiterated in a letter from HTI, indicating its non-opposition to NTUA Wireless’ ETC application and expressly consenting to NTUA Wireless’ petition to include the Jeddito Chapter as part of NTUA Wireless’ ETC service area. The HTI letter and an updated list of wire centers are included as separate exhibits to the attached Clarification.

Attachment 2 is a presentation that was provided to FCC Staff, including members of ONAP, during an in-person meeting held at the FCC on January 4, 2011, which predated NTUA Wireless’ formal filing of its ETC application with the FCC. Because NTUA Wireless’ ETC application had not been filed or docketed at the time of the January 4, 2011 meeting, the presentation was not filed with the FCC at that time. At the request of Commission Staff, this presentation is being submitted now as a historical document and has not been modified since the January 4, 2011 meeting. As such, the attached presentation is not meant to reflect current or changed circumstances that may have occurred with the passage of time, following that meeting.

Thus, in addition to this transmittal letter, this submittal includes:

Attachment 1 – NTUA Wireless, LLC Clarification of ETC Service Area to Include Jeddito Chapter (including Exhibit A – Letter of Non-Opposition from Hopi Telecommunications Inc. Regarding Request by NTUA Wireless for ETC Designation to Include Jeddito Chapter of Navajo Nation; and Exhibit B – List of Wire Centers Within Navajo Nation Exterior Boundaries)

Attachment 2 – NTUA Wireless LLC Pre-Filing Presentation to FCC Staff (Dated January 4, 2011)

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter and the listed attachments have been filed via ECFS and sent by email to each of the FCC staff members who participated in the January 9, 2014 discussion. If you have any questions or require any additional information, please contact me.

Respectfully submitted,

/s/ Seth T. Lucia
Seth T. Lucia
Counsel to NTUA Wireless, LLC

cc: Geoffrey Blackwell (via email)
Rebekah Douglas (via email)

Attachment 1:

NTUA Wireless, LLC Clarification of ETC Service Area to Include Jeddito Chapter

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of		
Petition of NTUA WIRELESS, LLC for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(6) of the Communications Act of 1934, as Amended		WC Docket No. 09-197

**NTUA WIRELESS, LLC
CLARIFICATION OF ETC SERVICE AREA TO INCLUDE
JEDDITO CHAPTER OF THE NAVAJO NATION**

NTUA WIRELESS, LLC (“NTUA Wireless”) a telecommunications service provider on the Navajo Nation, majority owned by the Navajo Tribal Utility Authority (“NTUA” or “Navajo Tribal Utility Authority”), an enterprise of the Navajo Nation, respectfully submits pursuant to the Federal Communications Commission’s (“Commission”) *ex parte* rules (47 C.F.R. §1.1206), this clarification (“Clarification”) related to the above-captioned petition by NTUA Wireless for designation as an Eligible Telecommunications Carrier (“ETC”) throughout the Navajo Nation.

Specifically, in response to inquiries raised by the Commission Staff on a January 9, 2014 conference call, NTUA Wireless clarifies for the record that NTUA Wireless seeks to include the Jeddito Chapter of the Navajo Nation as part of its proposed ETC service area within its pending ETC application, originally submitted on March 3, 2011 in WC Docket No. 09-197. Because NTUA Wireless seeks an ETC service area that covers the entire Navajo Nation, the Jeddito Chapter is necessarily included as part of the proposed ETC service area. Thus, this clarifying statement is consistent with previous statements in NTUA Wireless’ ETC filings that NTUA

Wireless seeks ETC designation for purposes of receiving federal universal service support as an ETC to provide Lifeline service throughout its ETC service area within the boundaries of the Navajo Nation,¹ which would expressly include the Jeddito Chapter. For further clarity, NTUA Wireless states for the record that its proposed ETC service area does not, and is not intended to, include any portion of the Hopi Reservation.

The Jeddito Chapter of the Navajo Nation lies within the study area of Hopi Telecommunications Inc. (“HTI”), which is the incumbent local exchange carrier that presently serves residents of the Jeddito Chapter of the Navajo Nation. Under existing precedent, the Commission may designate carriers as ETCs throughout an entire rural service area that lies within the limits of the Commission’s jurisdictional authority, *e.g.*, within American Indian reservations, without the need for redefinition.² Accordingly, neither NTUA Wireless nor HTI believe that redefinition is necessary in order for the Commission to designate the portion of HTI’s study area that covers the Jeddito Chapter as part of NTUA Wireless’ ETC service area.³

Included as Exhibit A to this Clarification is a letter from HTI that captures this understanding of the Commission’s authority, along with HTI’s express statement of non-

¹ See *Petition of NTUA Wireless, LLC for Designation as an Eligible Telecommunications Carrier on the Navajo Nation*, WC Docket No. 09-197 (March 3, 2011) at 20; *see also*, *Correction to NTUA Wireless, LLC Petition for ETC Designation*, (Aug. 18, 2011) at 2-3 (“ETC Application”); *see also*, *Second Amendment to Petition of NTUA Wireless, LLC for Designation as an Eligible Telecommunications Carrier for Lifeline Service and for Conditional ETC Status to Participate in the Tribal Mobility Fund Phase I (Auction 902) on the Navajo Nation*, (October 17, 2013) at 2, 5, 39 (reiterating that NTUA Wireless requests a designated service area that includes the area within the boundaries of the Navajo Nation for Lifeline purposes) (“Second Amendment ETC Filing”).

² See *In the Matter of Telecommunications Carriers Eligible for Universal Service Support; Standing Rock Telecommunications, Inc. Petition for Designation as an Eligible Telecommunications Carrier; Standing Rock Telecommunications, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order On Reconsideration, 26 FCC Rcd 9160, paras. 18-24 (2011) (“Standing Rock Order on Reconsideration”).

³ The HTI letter details that, notwithstanding precedent, in the event that the Commission decides redefinition of the HTI service area is necessary to include the Jeddito Chapter in NTUA Wireless’ ETC service area, HTI does not object to such redefinition. See Exhibit A.

opposition and consent to NTUA Wireless' ETC petition to include the Jeddito Chapter as part of NTUA Wireless' ETC service area. *See* Exhibit A.

Consistent with the foregoing, NTUA Wireless further clarifies for the record that its proposed ETC service area includes a partial wire center of the telephone company area of HTI that serves the Jeddito Chapter of the Navajo Nation. NTUA Wireless previously omitted to include HTI as one of the telephone company areas within NTUA Wireless' proposed ETC service area, listed at Exhibit E of its original March 3, 2011 ETC Application and Exhibit E of its October 17, 2013 Second Amendment ETC Filing. Thus, along with the companies listed in Exhibit E of those prior ETC filings, NTUA Wireless revises that list to include the following:

<u>Telephone Company</u>	<u>Full Study Area/ Complete Wire Center/ Partial Wire Center</u>	<u>Wire Center</u>
Hopi Telecommunications Inc. AZ	Partial Wire Center	KMCNAZXC

In furtherance of NTUA Wireless' Clarification of this matter, NTUA Wireless includes as Exhibit B to this Clarification the updated "List of Wire Centers Within Navajo Nation Exterior Boundaries," which now reflects HTI, appearing on the updated list in alphabetical order. This updated list of wire centers, included as Exhibit B of this Clarification filing, otherwise appears as Exhibit E of NTUA Wireless' original March 3, 2011 ETC Application, as well as Exhibit E of its October 17, 2013 Second Amendment ETC Filing.

With the clarification of the issues discussed herein, NTUA Wireless requests immediate

designation of its unopposed petition for designation as an Eligible Telecommunications Carrier.

Respectfully submitted,

NTUA WIRELESS, LLC

By: /s/ Seth T. Lucia

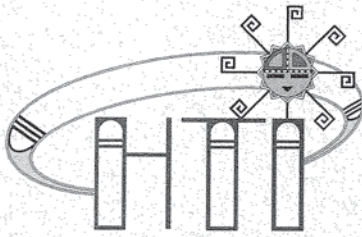
Derek Anthony Dyson
Seth T. Lucia
Duncan, Weinberg, Genzer, & Pembroke, P.C.
1615 M Street, N.W.
Suite 800
Washington, D.C. 20036
202-467-6370 (Office)
202-467-6379 (Fax)
E-Mail: DAD@dwgp.com
E-Mail: STL@dwgp.com

NTUA Wireless, LLC's Attorneys

January 15, 2014

Exhibit A:

**Letter of Non-Opposition from
Hopi Telecommunications Inc. Regarding
Request by NTUA Wireless, LLC for
ETC Designation to Include
Jeddito Chapter of Navajo Nation**



H O P I T E L E C O M M U N I C A T I O N S , I N C .

5200 E. Cortland Blvd. E110
Flagstaff, Arizona 86004

(928) 522-8428 Office
(928) 526-0242 Fax

www.hopitelecom.net

VIA FEDERAL EXPRESS

August 8, 2011

NTUA Wireless, LLC
c/o Walter Haase, Gen. Mgr.
Navajo Tribal Utility Authority
PO Box 170
Fort Defiance, AZ 86504

Dear Mr. Haase:

You have advised Hopi Telecommunications Inc. ("HTI") of the following facts. NTUA Wireless, LLC ("NTUA Wireless") filed an application for designation as an Eligible Telecommunications Carrier ("ETC") on the Navajo reservation ("ETC Application"), which is currently pending before the Federal Communications Commission ("FCC"). NTUA Wireless is seeking ETC designation for both high-cost and low-income universal service support, over the entire Navajo Reservation, including without limitation the Jeddito Chapter.

You have further assured HTI that the NTUA Wireless application does not include any portion of the Hopi Reservation within its requested ETC service area, and that the term "within the exterior boundaries of the Navajo Nation" was not and is not intended to include the Hopi Reservation, despite the geographical arrangement of the two reservations.

HTI is, of course, the incumbent landline local exchange company ("ILEC") for residents of the Jeddito Chapter, and the Jeddito Chapter lies within the study area of HTI, which is a rural landline carrier. You have also stated that NTUA Wireless does not seek redefinition of the HTI study area, and believes redefinition is not required pursuant to the FCC's recent *Standing Rock Reconsideration Order*¹.

This letter will confirm our prior oral statement that, on the basis of the foregoing, HTI has no opposition to the immediate grant of the NTUA Wireless ETC application, or to the inclusion of the Jeddito Chapter of the Navajo Reservation within the NTUA Wireless ETC service area.

If, notwithstanding the *Standing Rock Reconsideration Order, supra*, the FCC decides redefinition of the HTI service area is required for inclusion of the Jeddito Chapter in the NTUA Wireless ETC service area, HTI has no objection to such redefinition; *provided however*, in such case, the HTI study

¹ *In the Matter of Telecommunications Carriers Eligible for Universal Service Support Standing Rock Telecommunications, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order On Reconsideration, 26 FCC Rcd 9160, paras 18-24 (2011) ("*Standing Rock Reconsideration Order*")

area should be redefined only for the limited purpose of enabling NTUA Wireless to serve as an ETC in the Jeddito Chapter.

You are authorized to file a copy of this letter with the FCC in its proceeding addressing your ETC application. We wish you all success, and expedited FCC handling of your ETC application.

Sincerely,

A handwritten signature in dark ink, appearing to read "Carroll Onsaie", followed by a long horizontal line extending to the right.

Carroll Onsaie,
President/General Manager

cc: HTI file

Exhibit B:

**List of Wire Centers Within Navajo Nation
Exterior Boundaries**

NTUA Wireless, LLC

Navajo Nation ETC Service Area

Telephone Company	Fully Study Area/Complete Wire Center/Partial Wire Center	Wire Center
Arizona Telephone Company	Partial Wire Center	MRCNAZXC
Beehive Telephone Company	Partial Wire Center	DNRPUTXC
Century Tel of Southwest, Inc.	Partial Wire Center	PNHLNMXC
Citizens Telecom Co. of Wht Mtns, Inc.	Partial Wire Center	STJHAZXB
Hopi Telecommunications Inc. AZ	Partial Wire Center	KMCNAZXC
Navajo Communications Company	Full Study Area	BLMSAZXF
Navajo Communications Company	Full Study Area	CHNLAZXC
Navajo Communications Company	Full Study Area	DLKNAZXC
Navajo Communications Company	Full Study Area	DNHSAZXC
Navajo Communications Company	Full Study Area	FTDFAZXC
Navajo Communications Company	Full Study Area	GANDAZXC
Navajo Communications Company	Full Study Area	GSWDAZXC
Navajo Communications Company	Full Study Area	KABTAZXC
Navajo Communications Company	Full Study Area	KIVGAZXC
Navajo Communications Company	Full Study Area	KYNTAZXC
Navajo Communications Company	Full Study Area	LCHEAZXC
Navajo Communications Company	Full Study Area	LEPPAZXC
Navajo Communications Company	Full Study Area	LKCHAZXC
Navajo Communications Company	Full Study Area	MNFRAZXC
Navajo Communications Company	Full Study Area	PINNAZXC
Navajo Communications Company	Full Study Area	RDVYAZXC
Navajo Communications Company	Full Study Area	RHRKAZXC
Navajo Communications Company	Full Study Area	RKPNAZXC
Navajo Communications Company	Full Study Area	SHNTAZXC
Navajo Communications Company	Full Study Area	STMCAZXE
Navajo Communications Company	Full Study Area	TBCYAZXC
Navajo Communications Company	Full Study Area	TNPSAZXR
Navajo Communications Company	Full Study Area	TOYIAZXC
Navajo Communications Company	Full Study Area	TSILAZXC
Navajo Communications Company	Full Study Area	WDRNAZXC

Navajo Communications Company	Full Study Area	CRPNNMXC
Navajo Communications Company	Full Study Area	NAVJNMXC
Navajo Communications Company	Full Study Area	NSCHNMXC
Navajo Communications Company	Full Study Area	NWCMNMXC
Navajo Communications Company	Full Study Area	PBPONMXC
Navajo Communications Company	Full Study Area	SANSNMXC
Navajo Communications Company	Full Study Area	SHRKNMXC
Navajo Communications Company	Full Study Area	TBNTNMXC
Navajo Communications Company	Full Study Area	TDLNNNXC
Navajo Communications Company	Full Study Area	THTCNMXC
Navajo Communications Company	Full Study Area	TRNSNMXC
Navajo Communications Company	Full Study Area	TWLKNMXC
Navajo Communications Company	Full Study Area	HLCHUTXC
Navajo Communications Company	Full Study Area	MNCKUTXC
Navajo Communications Company	Full Study Area	MNVYUTXC
QWEST CORPORATION	Partial Wire Center	FLGSAZMA
QWEST CORPORATION	Complete Wire Center	GLLPNMFW
QWEST CORPORATION	Partial Wire Center	PAGEAZMA
SACRED WIND	Full Study Area	FRTNNMMA
SACRED WIND	Full Study Area	FRTNNMWE
SACRED WIND	Full Study Area	GLLPNMEA
SACRED WIND	Full Study Area	GLLPNMMA
Table Top Telephone Company	Partial Wire Center	SNDRAZXC
Western New Mexico Telephone	Partial Wire Center	MGDNNMXC

Attachment 2:

**NTUA Wireless LLC Pre-Filing
Presentation to FCC Staff
(Dated January 4, 2011)**

Overview of NTUA And Commnet Wireless, LLC Joint Venture Presentation to FCC Tribal Liaison Office January 4, 2011



Agenda

- Introductions
 - NTUA
 - Commnet
- Grant summary
- Joint Venture Business Summary
- ETC Application
- Questions/Comments



Introductions



Navajo Tribal Utility Authority (NTUA)

- Established on January 22, 1959, to begin addressing the absence of electricity on the Navajo reservation, the NTUA has grown into a thriving tribal-owned enterprise delivering a portfolio of services.
- The Plan of Operation states that the NTUA is organized for the operation, maintenance and expansion of electric, communication, natural gas, water/wastewater and photovoltaic (solar) services for the Navajo people at a low and reasonable costs.
- NTUA is financially strong, self-funded, Navajo Tribal Enterprise
- NTUA has considerable experience in development and operation of large scale utility businesses to serve the Navajo people.
 - NTUA is the primary service provider of electricity, gas, water and wastewater within the Navajo Nation
 - NTUA is managed by a Board of Directors
 - NTUA is required to provide tariffs for the services it provides
- NTUA currently provides wholesale cellular access to wireless cellular providers through several cellular towers co-located with NTUA's electric facilities.



NTUA – cont’d

- NTUA recognizes that over 60% of Navajo homes remain without landline telephonic service.
- The latest statistics indicate that the Navajo Nation has a 48.04% unemployment rate—over 4 times the current U.S. average and 40.4% of the families are below the poverty line. The average per capita income on the Navajo Nation is \$7,269, as compared to the U.S. average per capita income of \$30,547.
- NTUA promotes employment and economic development within the Navajo Nation
 - NTUA employs approximately 613 employees, of which over 97.5% are of Navajo descent.
 - NTUA supports Navajo law that promotes the use of qualified Navajo businesses for materials and services.
 - NTUA and Commnet have agreed to employ Navajo people at retail centers and in other capacities within the Joint Venture.
- NTUA is similarly joint venturing with experienced partners in developing renewable energy resources to create jobs and economic opportunity for the Navajo people.



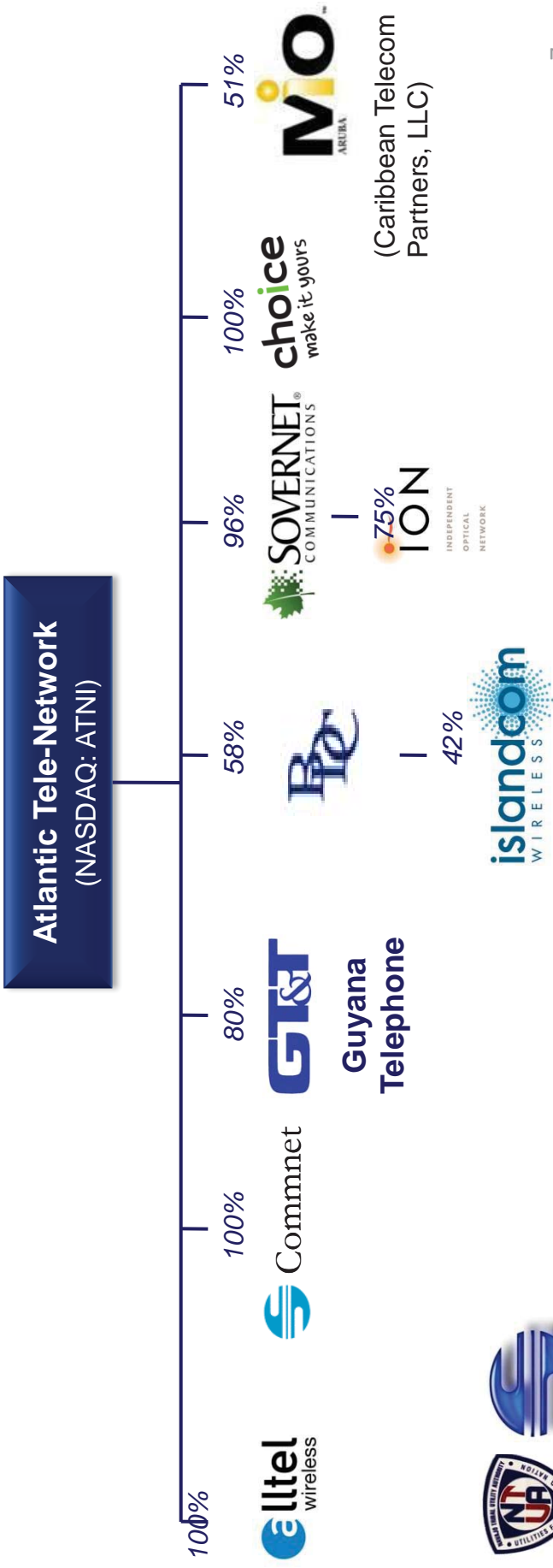
Commnet Wireless Overview

- Originally a Wholesale only wireless service provider in business since 1999 with over 600 base station deployed in the USA carrying over 2,000,000 MOU and 175 GB of Data Daily across 14 states.
- Tower/network construction , Maintenance, 24 Hour NOC, and Engineering/Accounting throughout multiple rural markets.
- Holder of numerous FCC Spectrum Licenses (850, PCS, 700, MW Common Carrier)
- Launched first retail product for wireless pre-paid and post-paid services in rural New Mexico and Nevada in November of 2010.
- Pursuing Telemedicine/E-Rate Business as well as providing Wholesale Backhaul Services to third parties such as Qwest.
- Wholly-owned subsidiary of Atlantic Tele-Network, Inc. (ATN) with ability to leverage balance sheet, economy of scale, and executive management experience.



ATN Company Overview

- Provides wireless and wireline telecommunications and video services in the Caribbean, North American, and South America
- Founded in 1987
- HQ in Beverly, Massachusetts
- Publicly traded on the NASDAQ under ATNI
- 8th largest wireless carrier in the US
- Annual revenues exceeding \$500M



BTOP Grant Summary



NTUA-Commnet Wireless ARRA Grant:



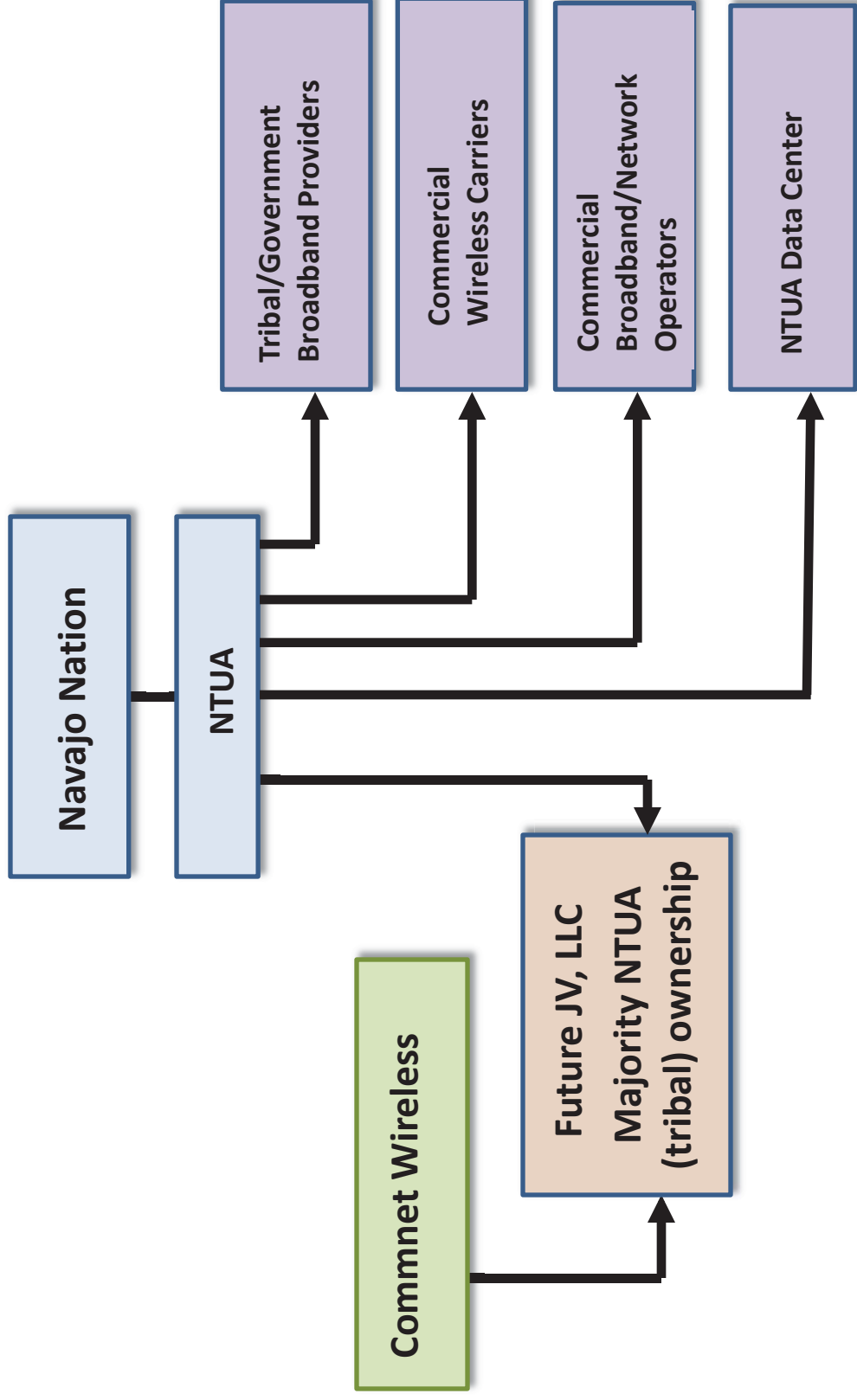
\$46M BTOP Award



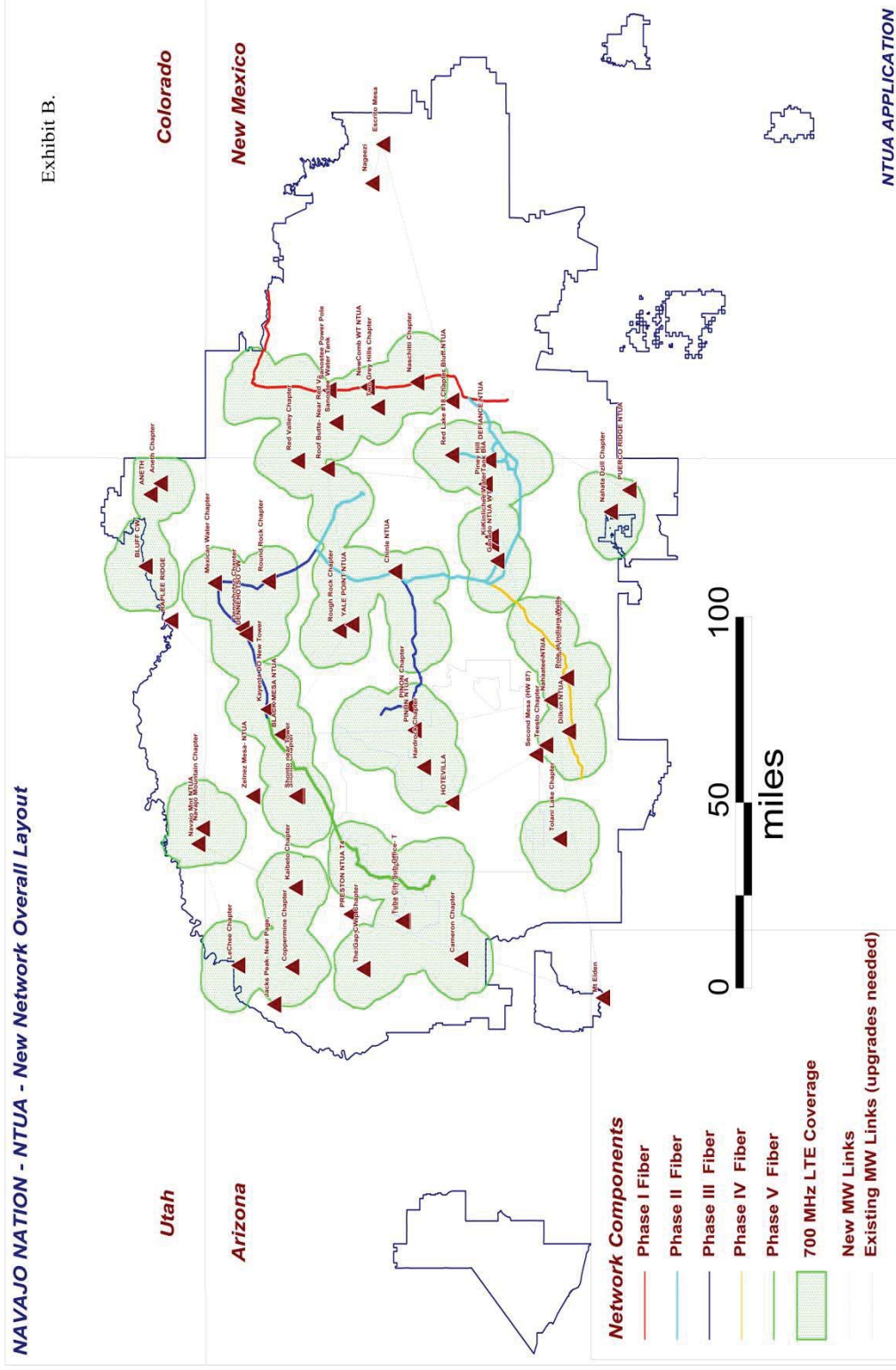
1. Fiber backbone across utilizing NTUA electrical infrastructure to offer data transport services to support the core utility operations and needs of the Navajo Nation.
2. Development of middle-mile (backbone) consisting of 96 aerial fibers (100 GB capacity) and licensed microwave -OC3 (155 Mbps); and last-mile- 4G Fixed or wireless broadband based on LTE 700 Mhz.
3. Network Business Products-
 - Network Transport backhaul services - Pt to Pt, WAN services.
 - Retail Broadband – Home, SOHO, Business.
4. Foundation for public-private equity partnership between NTUA and Commnet Wireless.

	Total Grant Budget	% of Total Budget	Grant Award	%	Grant Match	%
Total Grant	\$ 45,985,810.05	100%	\$ 32,190,067.04	70%	\$ 13,795,743.02	30%
NTUA	\$ 37,913,887.85	82%	\$ 26,539,721.50	70%	\$ 11,374,166.36	30%
Commnet Wireless	\$ 8,071,922.20	18%	\$ 5,650,345.54	70%	\$ 2,421,576.66	30%

NTUA Open Access Middle Mile



NTUA Grant Map



Joint Venture Summary



Joint Venture Strategy

Leverage			
NTUA Infrastructure	Existing Commnet Wireless Network and Expertise	Current Commnet and NTUA Microwave Networks	Navajo Pride of Tribal Ownership
			Existing NTUA Office Locations for Retail

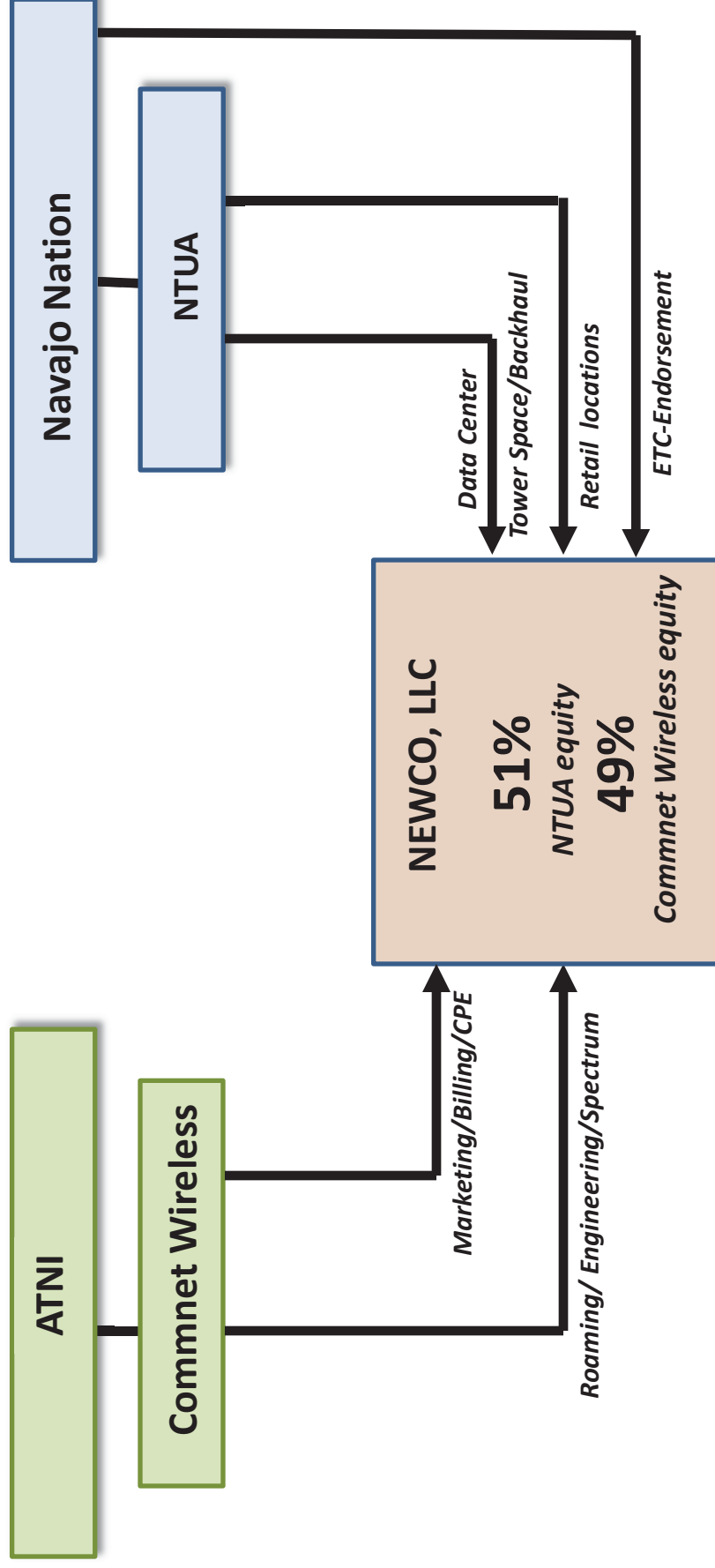


Achieve

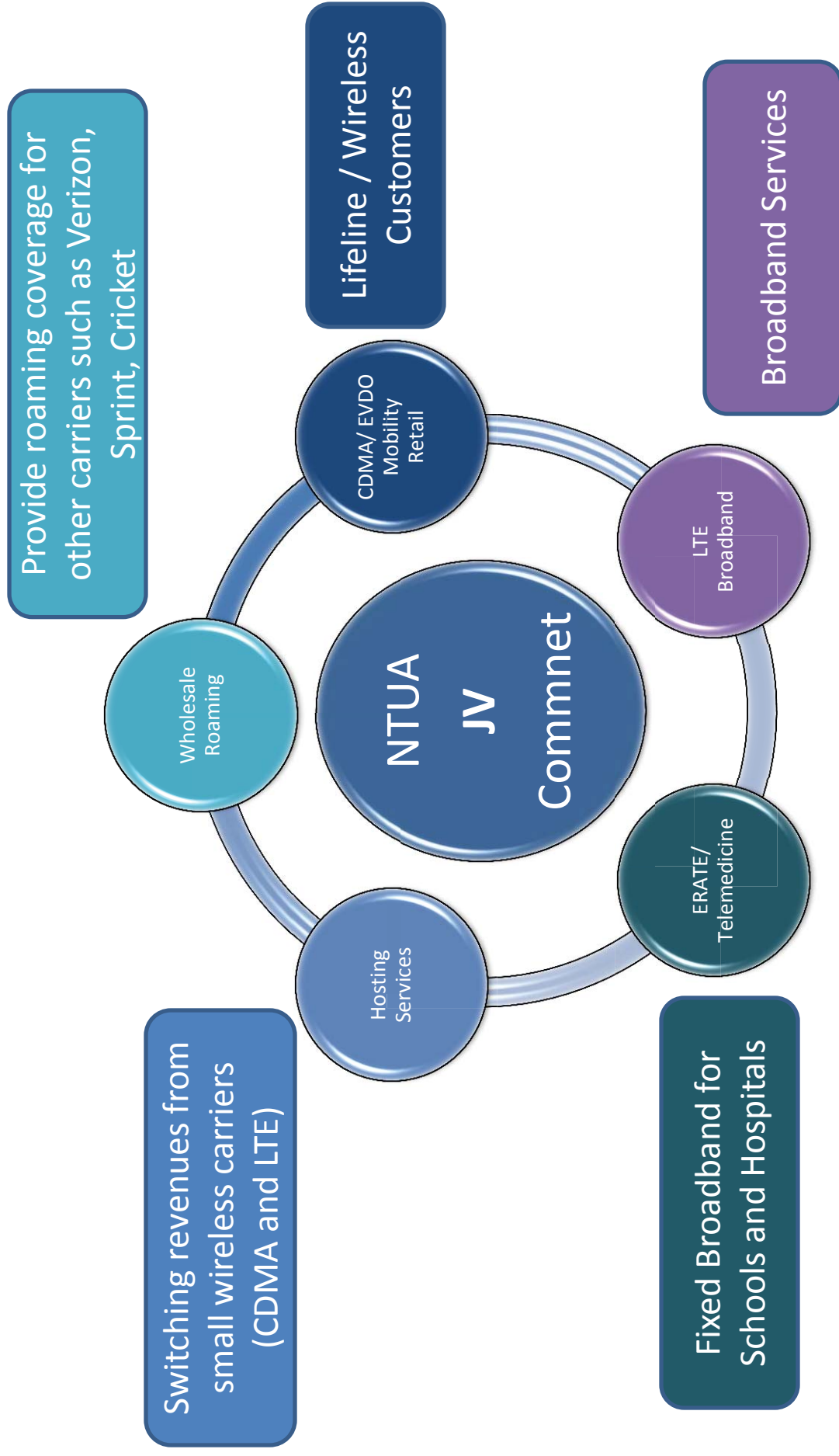
- Extensive Coverage
- Broadband Services
- Wireless Retail
- ETC Eligibility: High Cost Support, Lifeline Funding



NTUA / CWL Joint Venture Structure



Product Offerings



Benefits of the JV

Economic

- Provides the Navajo Nation with a vehicle to fund infrastructure development and on-going operational costs, and provide Lifeline service to tribal and other residents of the reservation

Careers

- The JV will employ local technical and sales professionals
- Switching equipment located in Shiprock providing high tech, high paying jobs for technical staff

Public Safety

- Enable 911 emergency service across the Navajo Nation
- The NEW Shiprock facility could serve as a home for PSAP equipment

3G Mobility

- Adding 3G voice and data (EVDO) services across the Navajo Nation



Benefits of the JV

- Promotes a Paradigm shift in working within the Navajo Nation by promoting majority ownership by Navajo Enterprises
- Provides the Navajo Nation with its first tribally-owned telecommunications resource
- Enables the Navajo Nation to provide telecommunications resources to help meet the tribe's utility needs
- Provides a mechanism for bringing external revenues for investment into telecommunications infrastructure
- Provides the opportunity to create high tech positions with extremely attractive compensation
- Creates a model to improve the quality of life for the Navajo people through economic development



ETC Application

- ETC Service Area: Navajo Nation
 - ETC Service Area limited to the Navajo Communication Company's study area, which is entirely within the exterior boundaries of the Navajo Nation (no redefinition required)
- FCC Jurisdiction: ETC designation limited to Navajo Nation, where states (AZ, NM, and UT) do not have jurisdiction
 - Application to be filed with FCC is being coordinated with the AZ, NM, and UT state commissions
 - Navajo Nation Telecommunications Regulatory Commission (NNTRC) exercises jurisdiction over the provision of service on the reservation
- USF Funding: Universal service support is critical for infrastructure development and on-going cost of providing service, including Lifeline Service
- ETC Application: To be filed in January 2011
 - No apparent issues or concerns
 - Has the support of the Navajo Nation



Questions/ Comments?

